

TECHNICAL REVIEW DOCUMENT
For
RENEWAL of OPERATING PERMIT 95OPEP147

Peterson Air Force Base (AFB)
El Paso County
Source ID 041/0016

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January 2008 – June 2008

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued March 3, 1998. The first renewal permit was issued on April 1, 2003, and expired on March 31, 2008. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted January 11, 2007, the letter submitted July 31, 2007, APENs submitted February 28, 2008 and May 23, 2008, and additional technical information submitted, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of this Technical Review Document (TRD) and any Technical Review Documents associated with the original permit and subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Source

The primary mission of Peterson Air Force Base (AFB) is space surveillance. This is accomplished through the use of sensors that detect, track and report on man-made objects in space, including active space systems and space debris. The Base receives and houses various sizes and types of aircraft and has an aeroclub. More than 6,000 military personnel are needed to operate the Base. There are 400 residential housing units and the support services needed for the convenience of the Base personnel.

Sources of emissions on the Base considered for this operating permit include approximately: 250 boilers, furnaces and hot water heaters; 38 emergency standby generators; 92 storage tanks; three refueling operations; a vehicle maintenance facility; 74 operational shops; an aircraft parts paint booth, an engine testing facility, paper disintegrators and routine aircraft maintenance activities.

The facility is located in the southeast part of Colorado Springs, El Paso County, Colorado. It is east of Powers Boulevard and immediately north of the Colorado Springs Municipal airport. The area in which the Base operates is designated as attainment for all criteria pollutants.

There are no affected states within 50 miles of the plant. There are no Federal Class I designated areas within 100 kilometers of the facility. Florissant Fossil Beds National Monument is a Federal land area within 100 kilometers of the facility. Florissant Fossil Beds has been designated by the State to have the same sulfur dioxide increment as a Federal Class I area.

Emissions

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to update the potential to emit based on revisions to permitted emission limits, and to update actual emissions.

AIRS ID	Equipment	FACILITY-WIDE POTENTIAL TO EMIT						
		PM	PM ₁₀	NO _x	CO	SO ₂	VOC	HAPs
029	Bldg. 1360 gasoline station						24.6	
030	Bldg. 1700 gasoline station						29.8	
046	Bldg. 218 generator			3.0	0.8			
047	Bldg. 2 – 3 generators			16.9	4.5			
050	2 Document disintegrators	0.12	0.12					
053	Bldg. 1844 generator			7.7	2.0			
057	Bldg. 1840 generator			7.7	2.0			
060	Bldg. 2 generator			7.5	2.0	1.2		
061	Bldg. 2 generator			7.5	2.0	1.2		
064	Bldg. 3 generator			5.7	1.5			
065	Paint booth						3.8	
066	Bldg. 504 generator			0.8	0.2			
067	Bldg. 1334 generator			2.02	0.44			
068	Bldg. 2019 generator			1.2	0.3			
036	Bldg. 920 generator			2.18	0.58			
059	Bldg. 361 generator			1.27	0.27			
Permitted Units Subtotal:		0.12	0.12	63.47	16.59	2.4	58.2	
	Insignificant Boilers, furnaces & heaters	9.20	9.20	121.04	101.67	0.73	6.66	2.29
	Fuel storage tanks						9.88	0.28
	Cooling towers	0.7	0.7				1.89	
	Insignificant generators	4.20	4.19	74.86	17.12	3.91	4.97	0.06
	Fire Pumps	0.46	0.46	6.48	1.39	0.43	0.53	0.005
	Jet Engine Testing	0.06	0.06	0.26	0.08	0.02	0.03	0
	Solvent Cleaning Tanks						0.12	
	Misc. Chemical Use						27.63	1.16
TOTALS:		14.74	14.73	266.11	136.85	7.49	109.91	8/20

¹ The PTE for the insignificant equipment is based on information reported by Peterson AFB in their 2006 Air Emission Inventory document.

	TONS PER YEAR						
	FACILITY-WIDE ESTIMATED ACTUAL EMISSIONS Calendar Year 2006 ²						
	PM	PM ₁₀	NO _x	CO	SO ₂	VOC	HAPs
TOTALS	1.6	1.6	23.2	15.4	0.4	21.3	2.0

² The actual emissions are based on information reported by Peterson AFB in their 2006 Air Emission Inventory document and reflect non-fugitive (point source) emissions.

Compliance Assurance Monitoring (CAM) Applicability

Peterson AFB is not required to obtain a CAM plan since no emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold.

NESHAP Applicability

40 CFR Part 63, Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources:

This subpart does not apply to surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration (per 40 CFR Part 63, §63.11169(d)(1)).

40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:

In the final NESHAP, EPA has included a provision that states that owners and operators of new and reconstructed stationary engines located at area sources will be in compliance with the NESHAP requirements if they meet the requirements of the SI NSPS (40 CFR part 60, subpart JJJJ) or the CI NSPS (40 CFR part 60, subpart IIII), as applicable. No further requirements apply for such engines under this part.

Existing engines at area sources have no requirements under this rule at this time.

Peterson AFB is considered an area source. The area source requirements of Subpart ZZZZ have not yet been incorporated into Colorado Regulation No. 8. This requirement will be considered Federal-Only at this point. The Division will include the Subpart ZZZZ requirement on the applicable engines.

40 CFR Part 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities:

Peterson AFB has 11 tanks subject to this subpart. This includes previously permitted tanks (AIRS ID 029 & 030) and tanks previously considered insignificant activities. The compliance date is January 10, 2011 for these existing sources.

With two of the tanks (located at Bldg. 200), Peterson AFB has reduced requirements since the tanks have a capacity less than 2000 gallons (§ 63.11118(c)(2)). Peterson AFB must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Gasoline handling measures are listed in §63.11116(a)(1) through (4). In addition, submerged filling must be used per §63.1117(b).

The other tanks are required to meet the gasoline handling practices, submerged filling, and the following requirements:

- A vapor balance system and associated management practices.
- Management Practices for Gasoline Cargo Tanks Unloading at Gasoline Dispensing Facilities
- Applicable testing requirements.
- Applicable notifications, record keeping, and reporting.

The requirements of Subpart CCCCCC have not yet been incorporated into Colorado Regulation No. 8. These requirements will be considered Federal-Only at this point. The Division will include the Subpart CCCCCC requirements in the permit for the applicable gasoline tanks.

40 CFR Part 63, Subpart BBBBBB—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities:

Peterson AFB reported (on 1/30/2008) that no facilities meet the criteria for Subpart BBBBBB.

NSPS Applicability

40 CFR Part 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

Many of the engines are subject to the emergency generator provisions of this NSPS. The requirements include:

- specific emission limitations
- smoke emission standards
- fuel requirements
- sulfur content
- monitoring requirements
- notification, reporting, and recordkeeping requirements

The requirements have been added into the permit for those engines that are subject.

III. Discussion of Modifications Made

Source Requested Modifications

A number of modifications were made to the permit as requested by Peterson AFB. Modification requests will be summarized under the appropriate emission source (or permit location) listed below:

Page following cover page

- The responsible official was updated.

AIRS ID 064 – Bldg. 3 Emergency Generator

The construction permit (05EP0962 – Issued July 18, 2006) has been incorporated into the Title V as requested, under Section II.9. The Final Approval Self-Certification documents were submitted to the Division on October 18, 2006. The notice of start-up reported a start-up date of May 31, 2006. The Construction Permit shall be considered “Final Approval” upon incorporation of the Construction Permit conditions into the Operating Permit. Peterson AFB also submitted a revised APEN with the renewal application to reduce diesel fuel use from 27,372 gallons/yr to 25,900 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements include:

- NO_x and CO emission limits.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.
- A requirement to follow the current operating and maintenance plan.

The insignificant activity tracking requirement from permit 05EP0962 has been removed from the Operating Permit. Peterson AFB is considered a Major Stationary Source based on the NO_x PTE emissions listed in this technical review document. This tracking was required in order for Peterson AFB to verify that they did not exceed Major Stationary Source emission thresholds. The tracking of emissions from insignificant activities would be of no benefit since Peterson AFB is already a Major Stationary Source.

AIRS ID 057 – Bldg. 1840 Emergency Generator

The construction permit (03EP0724 – Issued January 13, 2004) has been incorporated into the Title V as requested, under Section II.6. The Final Approval Self-Certification documents were submitted to the Division on August 31, 2004. The notice of start-up reported a start-up date of March 20, 2004. The

Construction Permit shall be considered "Final Approval" upon incorporation of the Construction Permit conditions into the Operating Permit. Peterson AFB also submitted a revised APEN with the renewal application to reduce diesel fuel use from 70,000 gallons/yr to 35,000 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements include:

- NO_x and CO emission limits.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 060 – Bldg. 2 Emergency Generator

The construction permit (04EP0397– Final Approval Issued March 8, 2007) has been incorporated into the Title V as requested, under Section II.7. The notice of start-up reported a start-up date of February 28, 2006. Peterson AFB also submitted a revised APEN with the renewal application to reduce diesel fuel use from 68,478 gallons/yr to 34,150 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements include:

- NO_x and CO emission limits.
- Calculated SO₂ emissions are now below APEN reporting level (2 tpy). The SO₂ limit has been removed from the permit.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 061 – Bldg. 2 Emergency Generator

The construction permit (04EP0398– Final Approval Issued March 8, 2007) has been incorporated into the Title V as requested, under Section II.8. The notice of start-up reported a start-up date of February 28, 2006. Peterson AFB also submitted a revised APEN with the renewal application to reduce diesel fuel use from 68,478 gallons/yr to 34,150 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements include:

- NO_x and CO emission limits.
- Calculated SO₂ emissions are now below APEN reporting level (2 tpy). The SO₂ limit has been removed from the permit.
- Fuel use limit.

- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 052 – Bldg. 216 Paint Booth

This paint booth has been removed and replaced with another paint booth as described below. The conditions associated with this paint booth (Construction Permit 02EP0633) have been removed.

AIRS ID 065 – Bldg. 216 Paint Booth

The construction permit (06EP0511– Initial Approval Issued May 10, 2007) has been incorporated into the Title V as requested, under Section II.2. The Final Approval Self-Certification documents were submitted to the Division on November 5, 2007. The notice of start-up reported a start-up date of February 25, 2007. The Construction Permit shall be considered “Final Approval” upon incorporation of the Construction Permit conditions into the Operating Permit.

Requirements include:

- VOC emission limits.
- Paint and material use recordkeeping.
- Opacity limitation. No Method 9 readings are required since opacity is not expected from a paint booth unit.
- A requirement to maintain exhaust filters on the booth to reduce particulate emissions.
- The Reg. 7 RACT requirement for disposal by evaporation.

AIRS ID 053 – Bldg. 1844 Emergency Generator

Peterson AFB submitted a revised APEN with the renewal application to reduce diesel fuel use from 51,786 gallons/yr to 35,000 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements are found in Section II.5 and include:

- NO_x and CO emission limits.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The operating hour annual limit has been removed. The fuel use limit will limit operating hours well below 500 hours per year. Emissions are based on fuel use, and operating hour tracking is not necessary.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 046 – Bldg. 218 Emergency Generator

Peterson AFB submitted a revised APEN with the renewal application to reduce diesel fuel use from 14,000 gallons/yr to 13,600 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements are found in Section II.3 and include:

- NO_x emission limit.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the fuel use is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 047 – Bldg. 2 Emergency Generators (three)

Peterson AFB submitted a revised APEN with the renewal application to increase diesel fuel use from 54,360 gallons/yr to 77,000 gallons/yr. The emission limits have been adjusted based on the revised APEN. Requirements are found in Section II.4 and include:

- NO_x and CO emission limits.
- Fuel use limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is required if any generator is operated more than 250 hours of operation. The Division determined that this is equivalent to 25,900 gallons of fuel per year.
- The operating hour annual limit has been removed. The fuel use limit will limit operating hours well below 500 hours per year. Emissions are based on fuel use, and operating hour tracking is not necessary.
- The Regulation No. 1 SO₂ emission limit.

AIRS ID 059 – Bldg. 361 Emergency Generator

Peterson AFB submitted a revised APEN with the renewal application to reduce diesel fuel use from 8,400 gallons/yr to 4,200 gallons/yr. The APEN was mistakenly marked as AIRS point 063. The correct AIRS point no. is 059. The emissions have been calculated based on the revised APEN. This engine was issued an APEN Required/Permit Exempt letter on June 4, 2004. This engine is now considered APEN Exempt since all criteria pollutant emissions are below 2.0 tons/yr. This generator has been removed from the Operating Permit and can now be considered an insignificant activity.

The Division will send an APEN Exempt letter to Peterson AFB for this generator.

AIRS ID 036 – Bldg. 920 Emergency Generator

Peterson AFB submitted a revised APEN for this generator on May 23, 2008, which requested 250 hr/yr operation and 10,000 gallons/yr diesel fuel. The Division has determined that this should be considered a significant emission unit for Title V purposes (only insignificant if less than 737 hp at 250 hr/yr operation). It is APEN required since requested emissions exceed 2.0 ton/yr. However, it is Construction Permit exempt since hours of operation will be less than 250 hours/yr (Construction Permit Exempt per Regulation No. 3, Part B, II.D.1.c.(iii)).

Requirements are found in Section II.12 and include:

- 250 hr/yr operation limit.
- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is typically required if operated more than 250 hours of operation. However, the generator is limited below 250 hr/yr operation. Thus, only one annual Method 9 reading is required in the renewal permit.
- The Regulation No. 1 SO₂ emission limit.

The Division will list this generator in the Operating Permit and send an APEN Required/Permit Exempt letter to Peterson AFB.

AIRS ID 066, 067, 068 – Bldg. 504, 1334 & 2019 Emergency Generators

As requested by the Division, Peterson AFB submitted three APENs (on February 28, 2008) for these emergency generators that are subject to the requirements in 40 CFR Part 60 Subpart IIII, “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines”, as adopted by reference in Colorado Regulation No. 6, Part A. If not for being subject to NSPS IIII, these engines would otherwise be considered APEN Exempt (and insignificant activities) due to low emissions. However, Colorado Regulation No. 3 requires emission units to submit APENs if they are subject to a NSPS. Peterson reported the following manufacture dates for these engines: 066= 8/15/2007, 067= 04/20/2007, 068=03/20/2006.

Upon further investigation, the engine under AIRS ID 068 is not subject to NSPS IIII since the manufacture date is prior to the trigger date of 4/1/2006. This engine will not be listed in the Operating Permit.

The Division will send an APEN Exempt letter for the generator covered by AIRS ID 068.

The applicable requirements have been incorporated into the Title V as requested, under Section II.10 & II.11. Requirements include:

- No emission limits were required since all criteria emissions are below APEN thresholds.
- Tracking of generator operating hours.

- Title V language for opacity. One Method 9 opacity observation is required on an annual basis if any fuel oil is used during the year. A 2nd Method 9 opacity reading is required if operated more than 250 hours of operation.
- The Regulation No. 1 SO₂ emission limit.
- Requirements of 40 CFR Part 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Requirements include emission standards for emergency engines, fuel standards, monitoring, notification, reporting, and recordkeeping requirements.

AIRS ID 069, 070, 071, 072– Bldg. 1470 & 2025 Emergency Generators

Peterson AFB submitted four APENs (on May 23, 2008) for these emergency generators. These are existing emergency generators that had not previously submitted APENs. None of these generators are subject to NSPS IIII since the manufacture dates are prior to the NSPS trigger date of 4/1/2006.

The emission rates for these generators are all very low. None of them have emissions exceeding 2 tpy. For this reason, the Division is sending APEN Exempt letters for each of these generators. These generators will not be listed in the Operating Permit.

Boiler, furnace & water heater fuel use limit

Peterson AFB requested a natural gas fuel use limit for all the boilers, furnaces, and water heaters located at the base. All these units are currently considered APEN Exempt & Insignificant Activities. Peterson AFB requested a fuel use limit that would represent operation for 10 months per year. The Division informed Peterson AFB that APENs would be required for these units to establish a permit limit. Bob Tomlinson requested that the Division remove the fuel use limit request from the renewal application on January 28, 2008.

AIRS ID 054 – Bldg. 668 JP-8 Storage Tank (206,791 gallon)

Peterson AFB requested removal of this tank from the Operating Permit. The only requirement had been a record keeping requirement from 40 CFR Part 60, Subpart Kb. The EPA modified the NSPS Kb requirements to no longer require this record keeping for tanks greater than 151 m³ (40,000 gal) which contain liquids with vapor pressure less than 3.5 kPa (per §60.110(b)). This tank meets the requirements to be exempt from this record keeping and is no longer required to be in the permit. This tank is now considered APEN Exempt and an insignificant activity. APCD Inventory & Support unit has been sent a memo to remove this tank from the inventory and consider it APEN Exempt.

AIRS ID N/A – Bldg. 1232 & 200 Gasoline Storage Tanks

Peterson AFB submitted information to the Division regarding these gasoline dispensing facilities. These operations were previously considered insignificant activities for the Operating Permit. The four gasoline storage tanks at these

locations are now subject to the NESHAP for Gasoline Dispensing Facilities (Subpart CCCCCC). As such, the Division must list the requirements in the Operating Permit. The Division has not adopted this Federal rule into Colorado Regulation No. 8 yet. Thus, the Division did not require submittal of an APEN for these tanks, and no official AIRS ID has been assigned. The only applicable requirements are NESHAP Subpart CCCCCC and the Regulation No. 1 opacity limit. These requirements have been incorporated into the Title V under Section II.15 & II.16. Subpart CCCCCC is listed as a Federal-Only requirement.

Appendix A

The list of insignificant activities has been updated by Peterson AFB.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal. These changes are as follows:

Section I – General Activities and Summary

- The appropriate Construction Permits were added to Condition 1.3.
- In Condition 1.4, General Condition 3.d., and 3.g (new general condition for general provisions) were added as State-only requirements.
- Removed Condition 1.7 from previous permit. This condition is not standard language and unclear.
- Condition 3.1 was drafted to reflect the current status of Peterson AFB with respect to PSD. Peterson AFB is considered a Major Stationary Source located in an attainment area.
- The table in Section 6 has been updated to reflect current permitted equipment.

Section II – Specific Permit Terms

The permitted emission units have been re-organized and re-formatted to reflect recently issued Operating Permits and current Division design. More notable changes are discussed below.

AIRS ID 050 - Two Document Disintegrators

- The Division removed previous Condition II.5.4. This is a requirement from the NSPS General Provisions (§60.11(d)). No NSPS requirements apply to these units and this is not an applicable requirement.

AIRS ID 029 - AAFES Bldg 1360 - Four 10,000 Gallon Gasoline Storage Tanks

- These four gasoline storage tanks at this location are now subject to the NESHAP for Gasoline Dispensing Facilities (Subpart CCCCCC). As such, the Division must list the Subpart CCCCCC requirements in the Operating Permit. The Division has not adopted this Federal rule into Colorado Regulation No. 8 yet. These requirements have been incorporated into the Title V under Section II.13.4. Subpart CCCCCC is listed as a Federal-Only requirement.

AIRS ID 030 - AAFES Bldg 1700 – Three 10,000 Gallon Gasoline Storage Tanks

- These three gasoline storage tanks at this location are now subject to the NESHAP for Gasoline Dispensing Facilities (Subpart CCCCCC). As such, the Division must list the Subpart CCCCCC requirements in the Operating Permit. The Division has not adopted this Federal rule into Colorado Regulation No. 8 yet. These requirements have been incorporated into the Title V under Section II.14.4. Subpart CCCCCC is listed as a Federal-Only requirement.

Section III – Permit Shield

- The citation in the permit shield was corrected. The reference to Part A, Section I.B.43 was changed to Part A, Section I.B.44 and the reference to Part C, Section XIII was changed to Part C, Section XIII.B.
- Many of the specific non-applicable requirements previously listed in Section III.1 have been removed. Some of those removed no longer apply. In addition, it is not necessary to list all non-applicable requirements.

Section IV – General Permit Conditions

- The Affirmative Defense Provision for Excess Emissions during Malfunctions language was added to condition 3.d.
- Condition 5 & 21: Replace “upset” with “malfunction”.
- Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 21 (prompt deviation

reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.

- The definition of “prompt” has changed and Condition 21 has been updated with the new definition.
- Minor language changes to Condition 22.d have been incorporated.

Appendix B & C

- This language has been updated to reflect current standard language.

Appendix D

- The address of EPA has been updated.